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1	RAMZY P. LADAH, ESQ.
2	Nevada Bar No. 11405 MICHAEL T. NIXON, ESQ
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7	Attorneys for Plaintiff
8	τ

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA, SOUTHERN DIVISION

RONALD JACKSON, an individual,

Plaintiff,

VS.

INC VONS VONS **COMPANIES** dba GROCERY STORE; **AMIGO MOBILITY** INTERNATIONAL INC: ROE MAINTENANCE COMPANY; DOES I through inclusive and ROE **BUSINESS** ENTITIES I through XXX, inclusive,

Defendants.

CASE NO.: 2:23-cv-00711-GMN-NJK

STIPULATION AND ORDER TO AMEND THE COMPLAINT TO DISMISS AMIGO MOBILITY INTERNATIONAL, INC. AND SUBSTITUTE MART CART AS THE PROPER DEFENDANT

COMES NOW Plaintiff RONALD JACKSON, by and through his attorney of record, RAMZY P. LADAH, ESQ. and MICHAEL T. NIXON, ESQ. of LADAH LAW FIRM, and Defendant VONS COMPLANIES INC. dba VONS GROCERY STORE, by and through their attorney of record, LEW BRANDON, JR., ESQ. and DANIELLE A. KOLKOSKI, ESQ. of BRANDON / SMERBER LAW FIRM and Defendant AMIGO MOBILITY INTERNATIONAL, INC. by and through their attorney of record, LOREN S. YOUNG, ESQ. of LINCOLN, GUSTAFSON & CERCOS, LLP hereby stipulate as follows:

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IT IS STIPULATED AND AGREED that Plaintiff voluntarily dismisses Defendant
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    AMIGO MOBILITY INTERNATIONAL, INC. without prejudice, all sides to bear their own fees
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    and costs;
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1 IT IS FURTHER STIPULATED AND AGREED that Plaintiff may file an Amended 2 Complaint for the purpose of removing AMIGO MOBILITY INTERNATION INC. from the 3 Caption and to file an Amended Complaint to include the manufacturer MART CART. 4 IT IS SO AGREED. 5 Dated this 19th day of June 2023. Dated this 19th day of June 2023. 6 **LADAH LAW FIRM BRANDON / SMERBER LAW FIRM** 7 /s/ Danielle A. Kolkoski, Esq. /s/ Ramzy P. Ladah Esq. 8 9 LEW BRANDON, ESO. RAMZY PAUL LADAH, ESQ. Nevada Bar No. 5880 Nevada Bar No. 11405 10 RYAN M. VENCI, ESQ. MICHAEL T. NIXON, ESQ. Nevada Bar No. 012839 Nevada Bar No. 7547 11 517 S. Third Street DANIELLE A. KOLKOSKI, ESQ. Las Vegas, NV 89101 Nevada Bar No. 8506 12 Attorneys for Plaintiff Ronald Jackson 139 E. Warm Springs Road Las Vegas, Nevada 89119 13 Attorneys for Defendant, Vons Companies, Inc. 14 dba Vons Grocery Store 15 Dated this 19th day of June 2023. 16 LINCOLN, GUSTAFSON & CERCOS 17 18 /s/Loren S. Young, Esq. 19 LOREN S. YOUNG, ESQ. Nevada Bar No. 7567 20 7670 w. Lake Mead Boulevard, Suite 200 Las Vegas, NV 89128 21 Attorneys for Plaintiff Amigo Mobility International, Inc. 22 23 **ORDER** 24 25 IT IS SO ORDERED. 26 July 27, 2023 27 STATES DISTRICT COURT JUDGE 28